FILED
July 27, 2012
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)	
ANDERSON MUNICIPAL LIGHT & POWER FOR)	
1) AUTHORITY TO INCUR INDEBTEDNESS, AND)	CAUSE NO. 44308
2) APPROVAL OF A NEW SCHEDULE OF RATES)	
AND CHARGES FOR ELECTRIC SERVICE)	

JOINT MOTION TO STAY CURRENT PROCEDURAL SCHEDULE PENDING SUBMISSION OF AGREED REVISED SCHEDULE BY PARTIES

Anderson Municipal Light & Power (Petitioner) and the Office of Utility Consumer Counselor (OUCC) agree and move as follows. There are no other parties or intervenors in this proceeding.

- 1. At the prehearing conference petitioner agreed to submit updated financial results for calendar year 2012. Petitioner expected those results would differ only immaterially from the calendar year 2011 test year results. However, upon undertaking the update, petitioner's accounting expert discovered it was substantially more difficult than anticipated, and upon recently completing the update, the 2012 results differ from test year results more significantly than expected, in the direction of a reduced revenue requirement.
- 2. Petitioner's experts are currently revising their pre-filed testimony and exhibits, and petitioner anticipates it can file amended case in chief testimony and exhibits, supporting a lower rate increase, on or before July 16, 2013.
- 3. The present procedural schedule, including the scheduled evidentiary hearing therefore cannot be achieved, and the parties request that the currently scheduled hearing and other upcoming procedural deadlines, including the OUCC's June 28, 2013 filing date, be stayed or cancelled pending the filing of petitioner's amended case-in-chief testimony and exhibits and an agreed proposed revised procedural schedule by the parties.

4. WHEREFORE, the parties, by agreement, respectfully request that the Commission stay or cancel the current procedural schedule pending the anticipated filing of petitioner's amended case in chief and receipt from the parties of an agreed, proposed revised procedural schedule.

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